

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Dixon-Marquette Cement, Inc.
1914 White Oak Lane
Dixon, Illinois 61021

ATTENTION: Mr. Neil DeRynck
Environmental Manager/Licensed Professional
Geologist

Request to Provide Information Pursuant to the Clean Air Act

The United States Environmental Protection Agency (U.S. EPA), by and through Cheryl L. Newton, Acting Director of the Air and Radiation Division, U.S. EPA, Region 5, and pursuant to section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a), hereby requires Dixon-Marquette Cement, Inc. (hereinafter Dixon-Marquette), to provide certain information to the U.S. EPA regarding its facility located at 1914 White Oak Lane in Dixon, Illinois. Section 114(a) of the Act authorizes the Administrator of the U.S. EPA to require the submittal of this information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, U.S. EPA, Region 5, who hereby issues this information request. The information that Dixon-Marquette must submit in response to this information request is specified in Appendix A of this document.

The U.S. EPA has determined that Dixon-Marquette is the owner or operator of an emission source as specified in section 114(a) of the Act. The U.S. EPA is requesting that Dixon-Marquette

submit the information specified in Appendix A to determine whether this emission source is complying with certain provisions of the Illinois State Implementation Plan, as approved by the U.S. EPA pursuant to section 110 of the Act, 42 U.S.C. § 7410; the Federal New Source Performance Standards (specifically, 40 C.F.R. Part 60, Subpart F); and the Prevention of Significant Deterioration (PSD) regulations. The federal PSD regulations are codified at 40 C.F.R. § 52.21 and were promulgated in accordance with Title I, Section C of the Act.

All of the information specified in Appendix A must be submitted according to the schedule specified therein. A person with sufficient knowledge and authority must also certify, on behalf of Dixon-Marquette, that all of the information that is submitted in response to this information request is true, correct, accurate and complete. All of the required information must be sent to the following addresses:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604;

Julie Armitage, Acting Manager
Compliance and Systems Management Section
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue
Springfield, Illinois 62702; and

Richard Jennings, Regional Manager
Region II
Illinois Environmental Protection Agency
5415 North University Avenue
Peoria, Illinois 61614

Failure to comply with any terms of this information request may subject Dixon-Marquette to an enforcement action pursuant to section 113 of the Act, 42 U.S.C. § 7413.

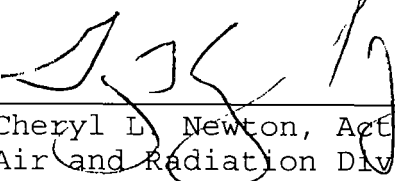
Dixon-Marquette may be entitled to assert a claim of business confidentiality, pursuant to 40 C.F.R. Part 2, Subpart B, regarding any portion of the information submitted in response to this request, except emission data as defined at 40 C.F.R. § 2.301(a)(2). Failure to assert a claim of business confidentiality renders all submitted information available to the public without further notice. Information which is subject to a claim of business confidentiality may be available to the public only to the extent provided in 40 C.F.R. Part 2, Subpart B.

The U.S. EPA may use any information submitted in response to this request in support of any administrative, civil, or criminal action against Dixon-Marquette. A knowing submittal of false information to the U.S. EPA may be actionable under section 113(c)(2) of the Act, as well as 18 U.S.C. §§ 1001 and 1341.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation.

Please call Noel Vargas at (312) 353-3575 if you have any questions regarding this request.

9/26/03
Date

 FLR
Cheryl L. Newton, Acting Director
Air and Radiation Division

APPENDIX A

Dixon-Marquette must install, operate and maintain continuous opacity monitoring systems (COMS) and continuous emission monitoring systems (CEMS) at its cement plant located at 1914 White Oak Lane in Dixon, Illinois.

U.S. EPA believes that Dixon-Marquette may be exceeding the opacity limitations under Ill. Admin. Code Rule 212, Section 212.123(a) at the kiln No. 4. U.S. EPA also believes that the clinker cooler No. 4 may be Subject to the NSPS Subpart F, which requires a more stringent opacity emission limitation.

To determine if a significant emission increase occurred at the kiln No. 4, U.S. EPA believes that CEMS for NO_x and SO₂ should be installed. These CEMS would ensure that both NO_x and SO₂ will be accurately monitored and measured under fluctuating conditions in the process.

These continuous monitoring systems must be installed, operated and maintained in accordance with applicable regulations (including but not limited to the General Provisions of 40 C.F.R. Part 60, Subpart A; 40 C.F.R. § 60.13; 40 C.F.R. Part 60, Subpart F; and 40 C.F.R. Part 60, Appendix B). The provisions of these regulations are outlined below, but this outline does not contain all of the specific requirements listed in the regulations which must be complied with, in order for Dixon-Marquette to comply with this information request. Dixon-Marquette must consult those regulations directly to ensure that all of the applicable rules have been identified.

Installation of these continuous monitoring systems must be completed within 90 days after receipt of this Request for Information.

CEMS/COMS TO BE INSTALLED:

1. Dixon-Marquette must install, operate and maintain CEMS to continually monitor and record sulfur dioxide (SO₂) emissions from kiln No. 4.
2. Dixon-Marquette must install, operate and maintain CEMS to continually monitor and record nitrogen oxides (NO_x) emissions from kiln No. 4.
3. Dixon-Marquette must install, operate and maintain COMS to continually monitor and record opacity emissions from kiln No. 4.

4. Dixon-Marquette must install, operate and maintain COMS to continually monitor and record opacity emissions from clinker cooler No. 4.
5. Dixon-Marquette must install, operate and maintain continuous flow monitors at the kiln No. 4.

INSTALLATION REQUIREMENTS:

1. The SO₂ and NO_x CEMS must be installed in accordance with 40 C.F.R. Part 60, Appendix B, Performance Specification 2, Section 8.0.
2. Each COMS must be installed in accordance with 40 C.F.R. Part 60, Appendix B, Performance Specification 1, Section 8.1 (1 and 2).
3. Each flow monitor must be installed in a location which provides a representative flow rate measurement where CEMS and/or COMS are sampling.
4. Each flow monitor must be installed, calibrated, maintained and operated in accordance with the manufacturer's guidance and recommendations.

Relative Accuracy Test Audit and Calibration Drift Tests:

1. Calibration drift tests on the SO₂ and NO_x CEMS must be conducted in accordance with 40 C.F.R. Part 60, Appendix B, Performance Specification 2, Section 8.3.
2. Relative Accuracy Test Audits for the SO₂ and NO_x CEMS must be conducted in accordance with 40 C.F.R. Part 60, Appendix B, Performance Specification 2, Section 8.4.
3. The following field audit performance tests must be conducted on each COMS after installation is complete [40 C.F.R. Part 60, Appendix B, Performance Specification 1, Section 8.1(3 and 4)]:
 - a. Optical alignment assessment.
 - b. Calibration error check.
 - c. System response time check.
 - d. Averaging period calculation and recording check.
 - e. Operational test period.
 - f. Zero calibration and upscale calibration drift test.

Performance Specifications to be met:

1. The SO₂ and NO_x CEMS must meet the performance specifications at 40 C.F.R. Part 60, Appendix B, Performance Specification 2, Section 13.1 - 13.3.
2. Each COMS installed must meet the performance specifications at 40 C.F.R. Part 60, Appendix B, Performance Specification 1, Section 13.1 - 13.3.
3. Dixon-Marquette must conduct the performance specification tests, according to the following schedule:
 - a. Within 30 days after achieving the maximum production rate at which Dixon-Marquette's kiln No. 4 and clinker cooler No. 4 will be operated, Dixon-Marquette shall conduct the above mentioned performance tests.
 - b. Within 30 days after conducting the above mentioned performance tests, Dixon-Marquette will furnish the Administrator a written report of the results of such performance tests.
 - c. The SO₂ and NO_x emission rates resulting from the above mentioned performing tests must be expressed in lb/hr, as well.

Additional Requirements:

1. All monitors installed in accordance with this information request must meet all of the applicable requirements of 40 C.F.R. § 60.13.
2. Each COMS installed pursuant to this information request must meet all of the applicable requirements of 40 C.F.R. § 60.11 and 40 C.F.R. Part 60, Subpart F, that the U.S. EPA specifies.
3. Once installed, tested, and certified, all monitors must initiate operation and collect emission data for a period of twelve (12) months. During this monitoring period, U.S. EPA may require Dixon-Marquette to run and fire its kiln No. 4 at different fuel ratios for representative emission data. The emission data for NO_x and SO₂ shall be expressed in parts per million by mass (ppmm), flow monitoring data in standard cubic feet per hour (scf/hr), and the opacity in percentage (%).
4. All information that is required to be submitted pursuant to this information request shall be submitted to the

addresses listed above. Subsequent notifications as indicated in 40 C.F.R. § 60.7 should be submitted on a quarterly basis (unless a different reporting schedule is requested by the U.S. EPA), commencing three months after the first CEMS or COMS is installed.

5. The U.S. EPA reserves the right to modify, amend or supplement this information request as it deems necessary.

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a "Request to Provide Information Pursuant to the Clean Air Act" by Certified Mail, Return Receipt Requested, to:

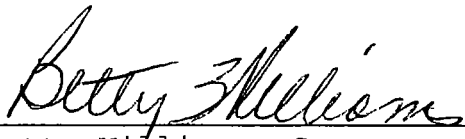
Mr. Neil DeRynck, Environmental Manager/Licensed
Professional Geologist
Dixon-Marquette Cement, Inc.
1914 White Oak Lane
Dixon, Illinois 61021

I also certify that I sent a copy of the same Request to Provide Information Pursuant to the Clean Air Act by First Class Mail to:

Julie Armitage, Acting Manager
Compliance and Systems Management Section
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue
Springfield, Illinois 62702; and

Richard Jennings, Regional Manager
Region II
Illinois Environmental Protection Agency
5415 North University Avenue
Peoria, Illinois 61614

on the 26th day of September 2003.


Betty Williams, Secretary
AECAS (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 1001 0320 000602953475